

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NESSA RISLEY, JAMES FREELAND,
ROBERT SCOTT, ANNIE VENESKY,
ANDREW CARDIS, and DEAN MEYERS,
individually and on behalf of all others similarly
situated,

Plaintiff,

v.

UNIVERSAL NAVIGATION INC. dba
UNISWAP LABS, HAYDEN Z. ADAMS,
PARADIGM OPERATIONS LP, AH
CAPITAL MANAGEMENT, L.L.C. dba
ANDREESSEN HOROWITZ, and UNION
SQUARE VENTURES, LLC,

Defendants.

Case No. 1:22-cv-02780-KPF

**DECLARATION OF PETER TROMBLY
IN SUPPORT OF MOTION TO ADMIT
COUNSEL *PRO HAC VICE***

I, Peter Trombly, declare as follows:

1. I am an associate at the law firm of Latham & Watkins LLP, and I am counsel for Defendant AH Capital Management, L.L.C.
2. I respectfully submit this declaration in support of my Motion to Admit Counsel *Pro Hac Vice* in the above-captioned matter.
3. I have been a member in good standing of the Bar of the Supreme Court of Virginia since December 4, 2019.
4. I attach a Certificate of Good Standing from the Supreme Court of Virginia, which was issued within thirty days of this filing, as Exhibit A to my Motion to Admit Counsel *Pro Hac Vice*.
5. I have never been convicted of a felony or been the subject of any criminal conviction.

6. I have never been censured, suspended, disbarred, or denied admission or readmission by any federal or state court in the United States.
7. I have never been the subject of a disciplinary sanction, and there are no disciplinary proceedings presently pending against me.

Wherefore your declarant respectfully submits that he be permitted to appear as counsel *pro hac vice* in this one case on behalf of Defendant AH Capital Management, L.L.C.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 21, 2022

/s/ Peter Trombly
Peter Trombly